

In addition, the rules should not restrict members/

Therefore, consumers should be able to initiate billing reviews either 60 days after the first billing statement for the charges, or from the time the goods or services were provided, or from the time the goods or services were to be provided, whichever is later.

308.7(h)

It is outrageous to allow any charges for conducting billing reviews when consumers assert that there are errors, even if no errors are found. Any charges would only discourage consumers from exercising their rights.

Question 37

Billing entities should be required to keep records for at least as long as the applicable statute of limitations. This information is vital in order for law enforcement officials to investigate and take enforcement action under these rules or other applicable laws or regulations.

Question 38

Consumers should not be charged any amount for calls that are deemed to be unauthorized.

308.7(j)

In order to ensure compliance and combat the abuses that have been so prevalent in the pay-per-call industry, billing entities, providing carriers, vendors and other agents should forfeit the right to collect any amounts from customers for charges where there have been violations of the Telephone Disclosure and Dispute Resolution Act.